

EXHIBIT W

BRUCE SCOTT - CONFIDENTIAL; May 20, 2019

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
Plaintiff,)
vs.) No. 3:17-cv-05806-RJB
THE GEO GROUP, INC.,) SOME OF THE EXHIBITS AND
Defendant.) THE TESTIMONY REGARDING
AS CONFIDENTIAL.

DEPOSITION UPON ORAL EXAMINATION
OF
BRUCE SCOTT

10:02 a.m.
May 20, 2019

800 Fifth Avenue 2000
Seattle, Washington 98164



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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1 Seattle, Washington; May 20, 2019

2 10:02 a.m.

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4
5 BRUCE SCOTT,

6 sworn as a witness by the certified court reporter,

7 testified as follows:

8
9 E X A M I N A T I O N

10 BY MS. CHIEN:

11 Q. Great. So my name is Marsha Chien. I
12 represent the -- sorry. I represent the State of
13 Washington. I just took a different deposition where I
14 represented a different agency.

15 So I know we just introduced each other. But
16 can you state your name for the record.

17 A. My name is Bruce A Scott, Jr.

18 Q. Have you been previously deposed?

19 A. Yes.

20 Q. About how many times?

21 A. Two times prior.

22 Q. Was it in the last five years?

23 A. One was in the last five years.

24 Q. So you may know some of these rules I'm about
25 to state. But I'm just going to go over them so we have



1 the Voluntary Work Program?

2 MR. DONAHUE: Object to the form.

3 A. I do not think they do.

4 Q (By Ms. Chien) So when you were implementing
5 or when you were putting forth these policies and
6 procedures for OSHA and WSHA, they were with regards to
7 detention officers as opposed to detainees; is that
8 right?

9 MR. DONAHUE: Object to the form.

10 A. Yes.

11 Q (By Ms. Chien) Did you get trained by Geo when
12 you first started?

13 A. Yes.

14 Q. What did that training look like?

15 A. The training was 40 hours of what we call an
16 annual refresher training.

17 Q. What did it involve?

18 A. The guidelines for the training program are
19 set in accordance with the contract. The contract lists
20 out the requirements of a 40-hour training for new
21 hires, depending on the level that, that you --
22 depending on the type of work that you do, the standards
23 and the contract require different types of training.

24 Q. Sorry. What training did you do when you
25 first started?



1 Q (By Ms. Chien) "Train staff," meaning Geo
2 employees?

3 A. Geo employees.

4 Q. Do you know the name of that contractor?

5 A. I can't recall off the top of my head.
6 There's the people we buy from. Then they buy from --
7 it's all contract stuff. I don't know who the specific
8 one is. I wouldn't want to guess.

9 Q. What about barbershop? Are detainee workers
10 working in the barbershop?

11 A. The barbershop does have detainee barbers.

12 Q. So detainees are cutting hair? Are detainees
13 cutting hair?

14 A. Yes.

15 Q. What training do they receive?

16 A. The ICE standard in the Voluntary Work Program
17 assignment standard allows -- it says when you're
18 volunteering for a job, if you have prior experience in
19 a position, to note that on the job. A lot of the
20 barbers that we have have prior -- were doing barbers
21 before in prisons and jails or just have other -- have
22 cut hair before. Then we have a law library slash
23 barbershop officer that's -- that monitors that area.
24 He would tell them the specifics of where the tool
25 accountability and all the specifics of that area. And



1 as I said before, the Voluntary Work Program Agreement
2 for that particular job would have some of the training
3 guidelines listed on that Voluntary Work Program
4 Agreement.

5 Q. So right now I have listed sanitation and
6 cleaning, laundry, food services, and then
7 barbershop/law library, just so we have this running
8 list. I'd like to go through each one and ask who makes
9 sure that the task is done.

10 So the sanitation and cleaning, the detainee
11 worker starts, get trained, signs this Voluntary Work
12 Program Agreement. Then what happens in terms of how
13 the task is assigned?

14 MR. DONAHUE: Object to the form.

15 A. Well, I'm still confused. How the task is
16 assigned or who gets selected first for that position?

17 Q (By Ms. Chien) Let's do what you're
18 suggesting. Let's talk about how the detainee worker
19 gets selected.

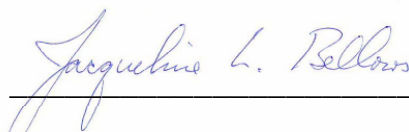
20 A. So based on the ICE standard, the PBNDS
21 standard, there's a waiting list, essentially first-come
22 first-served in order of clearance to work in that
23 position. Then whoever is next on the waiting list is
24 next the detainee that would have that Voluntary Work
25 Program assignment.



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this 1st
day of June, 2019.



Jacqueline L. Bellows
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